USEPA Review of draft Radiological Data Evaluation Findings Report for Parcels G Soil Trench Units  EPA review comments, Version 3, dated 10/20/2017					
Trench Unit	Overall score (0,1, or 2)	Box Plots Q-Q Plots	Rounds of excavation		On vs offsite lab
TU067	2	RAS results for all rads do not have very little variability and appear to be from a different population than all other surveys/samples so they look suspect.  K-40 FSS results appear to possibly b obtained from a different population of soil than the other surveys concentrations, and appear to be from a different population than the other surveys conducted at TU067.		<ul> <li>1 - Sampler name, off-site sample mass and COC forms for samples missing from reports.</li> <li>2 -Static survey not signed by RSO in SUPR</li> <li>3 - Raw scan data not in SUPR</li> <li>4 - Scan and static data do not appear to be consistent: scan data highest result was 4,843 cpm; static data ranged from 2,530-6,240 cpm</li> <li>Scan data appears to fall within the expected variability (2,608 - 7,560 cpm)</li> </ul>	According to Data Eval Plan, the on-site vs off-site data are consistent
TU068	2	FSS results have very low variability compared to other surveys, especially for K-40, DG K-40 variability changes bewtween sampling events  K-40 FSS results appear to possibly bobtained from a different population of soil than the other surveys conducted at TU068.	1	<ul> <li>1 - Sampler name, off-site sample mass and COC forms for samples missing from reports.</li> <li>2 -Static survey not signed by RSO in SUPR</li> <li>3 - Raw scan data not in SUPR</li> </ul>	According to Data Eval Plan, the on-site vs off-site data are consistent
TU069	2	RAS results for all radionuclides have low variability and for Ac-228 and Bi-214, indicate RAS results are from a different population than all other surveys/samples.  K-40 FSS results have very low variability, low concentrations, and indicate ther are different populations among the surveys, DG K-40 variability changes bewtween sampling events	on 3	1 - Sampler name, off-site sample mass and COC forms for samples missing from reports.  2 -Static survey not signed by RSO in SUPR  3 - Raw scan data not in SUPR  4 - Scan and static data inconsistent: highest count for statics was 4,676 cpm; scan data ranged from 3,220 - 6,200 cpm	According to Data Eval Plan, the on-site vs off-site data are consistent
TU071	2	RAS samples show different population for Bi-214  K-40 FSS-Bias have a large variability indicating either heterogeneous soil or potentially different soil populations  RAS K-40 results look different than other two surveys, however only two RAS samples were collected.  K-40 FSS-Bias has a wider range of values.	1	Gamma static survey data highest count was 6,165 cpm; scan survey data ranged from 4,000 - 7,500 cpm.  No range was provided for the Static survey data.  No signature and date from RSO recorded on the Static Data  Scan survey data not available for review, and no signature or date is recorded from the RSO.	According to Data Eval Plan, the on-site vs off-site data are consistent

Time Series	Suspect name (1=yes, 0=no)	Name, if suspect	Name, if not suspect	Signs of falsifying (1=Yes, 0=no)	Signs of falsification summary	ailure to follow orkplan =Y, 0=N)	Signs of failure to follow workplan	Comments - Other	Followup needed, e.g. questions for Navy	See additional EF statistical analys
								This survey unit is suspect for the following reasons:		
					1 -RAS results look suspicious due to very low variability  2 - Data Eval Review form indicates allegations associated with this TU. From NRC petition, a			1 - Former worker allegations regarding screening of soil from this trench unit at the RSY2. This indicates a high potential that FSS results could also have been falsified		
ome very low results for Bi-214 d K-40 occur on the same days in the characterization and biased					former worker alleges that RSY-2 laborers were directed by J. Taylor to collect less than the Work  Plan-required number of samples from soil excavated from TU067. Taylor told them to go get a  sample "from anywhere." They went behind the Conex to another pad and got an unrelated		Missing scan data, Chain- of-Custodies (COCs),	2 - RAS results do not have normal variability - suspect for falsification  3 - K-40 FSS results look like they are from a different popultaion than other surveys		
rveys, indicating that the samples illected on these dates are from a	1	R Roberson		1	"false" sample. Allen and Reggie	1	names of samplers, Radiation Safety Officer	4 - COCs and names of samplers missing in SUPR		
different population of soil than other results for the survey.					3 - Some very low results for Bi-214 and K-40 occur on the same days in the characterization and biased surveys, indicating that the samples collected on these dates are from a different	1	(RSO) signatures in SUPRs			
					population of soil than other results for the survey.			5 - No RSO signatures on survey results		
					4 - missing COCs and raw scan data in reports			6 - Raw scan data missing from SUPR		
								Recommend for re-sampling		
								This survey unit is suspect for the following reasons:		
					1 -RAS results look faked due to very low variability			1 - Variability in sample results for FSS low - suspect for falsification		
0 P V				2 - SUPRs missing COCs, RSO signatures, sampler names, and raw scan data in reports		Missing scan data, Chain-	2 - K-40 FSS results look like they are from a different population than other surveys			
	P Vigil		1	3 - Multiple excavations, adjacent to TU067 where worker allegations specify excavated soil was not scanned properly in RSY2	1	of-Custodies (COCs), names of samplers,	3 - COCs and names of samplers missing in SUPR			
					4- Population of K-40 on is much more variable on 9/19/07 than the remaining 10 events. From	1	Radiation Safety Officer (RSO) signatures in SUPR	4 - No RSO signatures on survey results		
					9/19/07 to 9/20/07 variability drops.			5 - Raw scan data missing from SUPR		
								Recommend for re-sampling		
								This survey unit is suspect for the following reasons:		
					1 -RAS results for all radionuclides have low variability.  2 - Ac-228 and Bi-214 RAS results are from a different population than all other surveys/samples			1 - RAS results do not have normal variability and are from different popultaiton than other surveys for Ac-228 and Bi- 214 - suspect for falsification		
ys-1 and FSS-Bias results for K-40	1				3 - SUPRs missing COCs, RSO signatures, sampler names, and raw scan data in reports			2 - K-40 FSS results look like they are from a different popultaion than other surveys		
e from a different population than e RAS of FSS. This indicates there	1	A Jahr		1	4 - Multiple excavations, near to TU067 where worker allegations specify excavated soil was not	1	Missing scan data, Chain- of-Custodies (COCs),	3 - COCs and names of samplers missing in SUPR		
may be different populations of pils/samples represented between the different surveys.					scanned properly in RSY2, DG K-40 more variable on 9/19/07 and 10/17/07 then other sampling events.		names of samplers, Radiation Safety Officer (RSO) signatures in SUPR	4 - No RSO signatures on survey results		
the different surveys.					5 - Worker involved in allegations included in sample team		(NSO) Signatures in SOT N	5 - Raw scan data missing from SUPR		
					6 - K-40 more variable on 9/19/07 and 10/17/07 than other sampling events.			6 - Worker involved in allegations performed work at this TU		
								Recommend for re-sampling		
									Section 4 of Data Eval	
Cs-137 results were mostly non-					1 - Scan survey data not available for review		Missing scan data, and	1 - Remediation was performed due to Cs-137, the time series plots show that most of the characterization results for	Form states "No gamma	1
etect or negative. Cs-137 results ould not be mostly negative. This		P Vigil		1	2 - Static data range not provided in Data Eval Form.	1	static data, Chain-of- Custodies (COCs), names		with the FSS samples	
indicates a potential data quality		''		_		-	of samplers, Radiation	2 - Gamma scan data missing, and no RSO signature and date on static and scan data.	specific dataset static/scan results."	
issue.					3 - No RSO signature and date provided for static or scan data		Safety Officer (RSO) signatures in SUPRs	Recommend resample to confirm ROC concentrations for Ra-226 and Cs-137	Need explanation on	
									what this means.	

TU072	2	No anomalies noted  No anomalies  No anomalies  No anomalies  No anomalies  The Data Eval Form states the static data (highest count was 4,279 cpm) are inconsistent with the scan results (3,890-6,720 cpm)  COCs not provided in SUPR	According to Data Eval Plan, the on-site vs off-site data are consistent
TU073	2	No anomalies noted  Scan data (highest count was 4,673 cpm) and Static data (4,240 - 8,750) are not consistent.  RSO signature and date missing from survey data, sampler not identified in SUPR set of data.	According to Data Eval Plan, the on-site vs off-site data are consistent
TU074	2	No comparisons made - only one set of FSS data collected  No comparisons made - only variable  No comparisons made - only variable  No comparisons made - only one set of FSS data collected  No comparisons made - only one set of FSS data collected  1 - Scan and static data are inconsistent. Static results ranged from 4,300 - 5,800 cpm; scan ranged from 1,630 - 6,750 cpm.  2 - Low value in scan data unusual because it is below background.  3 - Small range/low variability in Static results  3 - Scan data performed after FSS sample collection.	According to Data Eval Plan, the on-site vs off-site data are consistent
TU075	2	Each event for each ROC has different variability with varying means. RAS and Bias results are slightly higher when compared to SYS-1 or FSS results for Ac-228 and Bi-214; however the number of RAS and FSS-Bias results is small and the differences in concentration ranges are relatively small  RAS and FSS-Bias K-40 data have a different slope than SYS-1 or FSS data sets, however range of values for RAS and FSS-Bias is only slightly different and number of samples is small because these low values are significantly lower than background.  Data Eval Form noted that there were negative results for Ra-226, low K-40 concentrations, and two results for Ac-228 at or below 0 pCi/g. Static and scan data are not consistent. Static results ranged from 4,200 - 6,200 cpm; scan data are not consistent. Static results ranged from 1,370 - 7,720 cpm.  Low values in scan data are unusual because these low values are significantly lower than background.	According to Data Eval Plan, the on-site vs off-site data are consistent

No trends idenitified 1	R Roberson	1	1 - Inconsistent scan and static data; highest count for static survey was 4,279 cpm where scans ranged from 3,890 - 6,720 cpm2 - SUPR missing COCs  2 - Worker involved in allegations included in sample team	Missing Chain-of- Custodies (COCs) in SUPR  Narrow range of static cpm data indicates static measurements were not collected from different locations as required based on scan results.  1 - Scan and Static data are inconsistent  2 - SUPRs do not contain COCs for samples collected. Without this documentary evidence, the integrity, location, date, time or evidence of who had custody of the samples is missing. Therefore, the data is not defensible and not usable for decision making.  Recommend resample to confirm ROC concentrations	10
No trends identified. 0	P Vigil	1	1 - Scan and Static data inconsistency; narrow range of static data values which is not consistent with environmental monitoring.  2 - RSO signature on scan and static data results is missing  3 - Suspect worker involved with data collection	Missing RSO signatures on scan and static data results in SUPR  1 - TU is downstream from Building 274 used for decontamination training and offices, Building 322 used by NRDL for development of radiation detection instrumentation (no contamination found and building demolished), and Buildings 313, 313A used by NRDL for Instrumentation laboratory and as stockroom and storage areas.  2 -Cs-137 was found above the action level in 2002; but no evidence of residual radioactivity above the release criteria was found in 2014.	EPA statistician prepared additional specific analysis for this survey unit, shown separtely
It is noted that extremely low results for Ac-228, Bi-214, and K-40 reported on the same days, indicating a potential problem with the data on these dates. Time series plots dates were not legible	P Vigil	1	1 - Scan and static data are inconsistent. Static results ranged from 4,300 - 5,800 cpm; scan ranged from 1,630 - 6,750 cpm.  2 - Low values in scan data unusual because the low counts per minute are within a range that is below background.  3 - Scan data performed after FSS sample collection.	1 - TU074 was not remediated but is adjacent to TUs 81 and 83 which did have contamination.  Scan data collected after FSS sample collection which is a departure from the Work Plan.  Narrow range of static cpm data indicates static measurements were not collected from different locations as required based on scan results.  1 - TU074 was not remediated but is adjacent to TUs 81 and 83 which did have contamination.  2 - Sanitary sewer is associated with Bldg 401, used for storage of sealed sources, a maintenance shopt, and offices, a trades shop, and general store. No contamination is expected to have been released from this building; however, TU075 which was also connected to Bldg. 401 did have contamination.  3 - Scan and Static data are inconsistent, with unusually low results in scan data and in FSS data.  4 - Scan was performed after FSS samples collected.  5 - Sampler not identified in SUPR, person responsible for gamma scans and static measurements is listed on the NRC petition as a suspect worker.  Recommend for re-sample	
Ac-228 and Bi-214 RAS and Bias results are from a different 0 population than SYS-1 or FSS results	P Vigil	1	Inconsistent static data (4,200 - 6,200 cpm) and scan data (1,370 - 7,720 cpm), scan data includes results below background levels.  Suspect worker involved in data collection.  Each event for each ROC has different variability with varying means.	Section 4 of the Data Eval Form states that there was no mention of pipe swipe surveys or sediment sampling in manholes. This would indicate a deficiency in the investigation and a departure from the Work Plan.  Narrow range of static cpm data indicates static measurements were not collected from different locations as required based on scan results.  1 - Data Eval Form noted that there were negative results for Ra-226, low K-40 concentrations, and two results for Ac-228 at or below 0 pCi/g. Reviewer comment: this could indicate poor data quality and/or falsification.  2 - Static and scan data are inconsistent. Static results ranged from 4,200 - 6,200 cpm; scan data ranged from 1,370 - 7,720 cpm: Low values in scan data are unusual because these low values are significantly lower than background.  4 - Sanitary sewer is associated with Bldg 401, used for storage of sealed sources, a maintenance shopt, and offices, a trades shop, and general store. The narrative states that no contamination was found on surfaces or drains in the building, therefore it is not expected that contmamination released from this building.  5 - Section 4 of the Data Eval Form discusses the contamination that was found in this TU, despite the purported lack of contamination in Bldg 401. The narrative also states that there was no mention of pipe swipe surveys or sediment sampling in manholes, therefore the investigation did not follow the Work Plan and is deficient. This is important to note because contamination was found in this trench.  6 - Suspect worker involved in static/scan surveys  Recommend re-sampling.	EPA statistician prepared additional specific analysis for this survey unit, shown separtely

TU076	2	All surveys/sample collection results have low and/or non-detect results for Ac-228  K-40 results have large range of values/variability, especially in FSS.  Static and scan data inconsistent. Static ranged from 4,452 - 4,914; scan data ranged from 3,000 - 7,000 cpm	On-site lab reported higher Bi-214 and Ra-226 values than off-site lab.
TU078	2	All surveys/sample collection results have low and/or non-detect results for Ac-228 except for FSS-Bias results  K-40: mean stays the same but spread up and down varies between events  Cs-137: negative measurments appear to be remedied in 3/17 2008, 6 sampling events prior contain many negative activity levels  K-40 FSS has large range of values compared to other survey units.  Static and scan data inconsistent. Static ranged from 3,953 - 4,543; scan data ranged from 3,000 - 7,000 cpm	On-site lab reported higher Bi-214 and Ra-226 values than off-site lab.
TU079	2	Only FSS data collected, no Only FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data rads in FSS data  ONLY FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data  O Static and scan data inconsistent. Static ranged from 5,326 - 5,943; scan data ranged from 3,430 - 6,790 cpm	According to Data Eval Plan, the on-site vs off-site data are consistent
TU080	2	Only FSS data collected, no Only FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data  Comparison of the conducted of the conduction of the	On-site lab reported higher Bi-214 and Ra-226 values than off-site lab.

						1 - Sanitary sewer is associated with Bldg 411. Data Eval Form does not state what activities occurred in these	
						buildings.	Need to look at data
						2. Chatic and care data are inconsistent, static results repeat from 2.054, 4.542 are and care data repeat from	more closely to identify
						2 - Static and scan data are inconsistent; static results ranged from 3,954 - 4,543 cpm and scan data ranged from 3,000 - 7,000 cpm. Inconsistency, and reporting of exact same cpm range for scan data in TU 076 and TU078 is flag	possible reasons for low
				1 -Static and scan data inconsistent. Static ranged from 4,452 - 4,914; scan data ranged from	Narrow range of static	for falsification.	and data
				3,000 - 7,000 cpm. Range for static data is too small indicating static data is falsified.	cpm data indicates static	e la	inconsistencies. For
All surveys/sample collection results					measurements were not	3 - Suspect worker involved in data collection.	example: Were scan and
have low and/or non-detect results for Ac-228	1	J Cunningham	1	2 - All surveys/sample collection results have unusually low and/or non-detect results for Ac-228.  This indicates either poor data quality or falsification.	collected from different		static data sets
10f AC-228				This mulcates either poor data quanty or raisincation.	locations as required	4 - Probable data quality issues with low Ac-228 results. Adjacent TUs 078, 080 also had several Ac-228 results that	approved/signed by
				3 - Suspect worker involved with data collection.	based on scan results.	were at or below 0. In addition TU077 had the same Ac-228 low or at 0 results.	RASO? Are COCs
		Data Eval		Data Eval Form states TU076 is adjacent to Bldg 411. Similarily, TU078 and TU080 are also adjacent to Bldg. 411.	present in SUPR? Were		
						Samples collected from all three TUs include several Ac-228 results that are at or below 0, and similarities were	any data quality issues mentioned in RACR or
						observed with samples collected from TU077 which is adjacent to TU076.	SUPR?
						Recommend re-sample.	JOFN!
						1 - Sanitary sewer is associated with Bldg 411 and 439. Data Eval Form does not state what activities occurred in	
						these buildings.	
				1 -Static and scan data inconsistent. Static ranged from 3,953 - 4,543; scan data ranged from		2 - Adjacent TUs 076, 080 also had several Ac-228 results that were at or below 0. In addition TU077 had the same	
				3,000 - 7,000 cpm. Range for static data is small.		Ac-228 low or at 0 results.	
					Narrow range of static	2. Static and can data are inconsistent, static regults reprod from 2.054, 4.542 and and data reprod from	
All surveys/sample collection results				2 - Scan data is reported to be exactly the same as TU076 (3,000 - 7,000 cpm)	cpm data indicates static	3 - Static and scan data are inconsistent; static results ranged from 3,954 - 4,543 cpm and scan data ranged from 3,000 - 7,000 cpm. Inconsistency, and reporting of exact same cpm range for scan data in TU 076 and TU078 is flag	
have low and/or non-detect results for Ac-228	0	S. Brown	1		measurements were not	for falsification.	
				3 - Unclear whether Scan/Static personnel S. Brown is the same as Emitt Brown from NRC list	collected from different		
				4 - K-40: mean stays the same but spread up and down varies between events	locations as required	4 - It is unclear whether suspect worker was involved in data collection.	
				Cs-137: negative measurments appear to be remedied in 3/17 2008, 6 sampling events prior	based on scan results.		
				contain many negative activity levels		Data Eval Form states TU076 is adjacent to Bldg 411. Similarily, TU078 and TU080 are also adjacent to Bldg. 411.	
						Samples collected from all three TUs include several Ac-228 results that are at or below 0, and similarities were	
						observed with samples collected from TU077 which is adjacent to TU076.	
						Recommend re-sample.	
						1 - Sanitary sewer is associated with Bldg 411 and 439. Data Eval Form does not state what activities occurred in	
						these buildings. HRA info is needed to evaluate potential for contamination of sewer lines/TU079.	
							Sanitary sewer is
						2 - Static and scan data are inconsistent; static results ranged from 5,326 - 5,943 cpm and scan data ranged from	associated with Bldg
					Narrow range of static	3,430 - 6,790 cpm.	411 and 439. Data Eval
				Static data (5,326 - 5,943 cpm) and Scan data (3,430 - 6,790 cpm) are not consistent, static data	cpm data indicates static	3 - Suspect worker involved in data collection.	Form does not state
Variable data, large range of values	1	P Vigil	1	has very narrow range of values compared to what would be expected for environmental	measurements were not	3 - Suspect Worker Involved III data confection.	what activities occurred
variable data, large range or variation	_	1 1 1 1	_	conditions.	collected from different	4 - One sampling event with very narrow range in static results, indicating static data was collected from only one or	in these buildings. HRA
					locations as required	two locations rather than	info is needed to
					based on scan results.		evaluate potential for contamination of sewer
						5 - Probable data quality issues with Ac-228 results, Adjacent TUs 076, 078, and TU108; and nearby TUs 077, 080,	lines/TU079.
						082 also had several Ac-228 results that were at or below 0	
						6 -	
						1 - Sanitary sewer is associated with Bldg 411. Data Eval Form does not state what activities occurred in these buildings. HRA info is needed to evaluate potential for contamination of sewer lines/TU079.	
						buildings. The line is needed to evaluate potential for containination of sewer lines/10079.	Sanitary sewer is
						2 - Adjacent TUs 076, and TU087 (also adjacent to Bldg. 411); and nearby TUs 077, 080, 082 also had several Ac-228	associated with Bldg
					Narrow range of static	results that were at or below 0.	411. Data Eval Form
					cpm data indicates static		does not state what
Variable data, large range of values	1	R Zahensky	1	Static and scan data inconsistent. Static ranged from 6,089 - 7,126 cpm; Scan ranged from 4,250 -	measurements were not	3 - Static and scan data are inconsistent; static results ranged from 6,089 - 7,126 cpm and scan data ranged from	activities occurred in
- 1 acta, large range of values	_			6,500 cpm	collected from different	4,250 - 6,500 cpm.	this building. HRA info is
					locations as required	A Cooperatorial and in data and in data	needed to evaluate
					based on scan results.	4 - Suspect worker involved in data collection.	potential for contamination of sewer
						5 - Probable data quality issues with Ac-228	lines/TU080.
						7	,
						6 - 1 sampling event	
							<del></del>

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TU082	2	All survey types had very low concentrations of Ac- 228, or concentrations at 0; RAS results for Ac-228 also had negative values FSS-BIAS spread different for K-40 then other events however mean is similar. Cs-137 affected by negative values.	No anomalies in trends observed; howevere Ac-228 results were low, with some reported as 0 or negative (RAS).	2	RAS Samples 56 and 58 were collected 05/05/08, sample 57 listed as collected on 05/08/08; reports however, were generated on 05/05/08. Record of collection date for sample 57 may be typographical, or may indicate falsification.  Static data (5,611 - 6,564 cpm) were inconsistent with Scan data (4,750 - 6,920 cpm).
TU083	2	All surveys resulted in low and/or negative values for Ac-228.  Narrow range and low values noted for Bi-214 in the FSS-SYS (conc ranges from approximately 0.3 - 0.45 pCi/g). The box plots do not provide the uncertainty values associated with any of the results so it is not clear how accurate these results are at such low concentrations.  K-40 results were fairly consistent between survey types, but all surveys had highly variable (large range of vlaues between approximately 1 or 2 pCi/g - 30 pCi/g) in all surveys.	All three surveys for K-40 had similar distributions, with a large range of values	2	The FSS results demonstrate high variability in K-40 results but low variability in Ac-228 and Bi-214.  Pb-214 noted to have two populations  Data Eval Form states Static and Scan data (2,000 - 5,000 cpm) are inconsistent. Static data range not provided.  Data Eval Form states Static data are potentially falsified but no evidence regarding sampling falsification is available.  Static scan date and time not provided in SUPR  Scanning was performed after FSS samples collected.
TU085	2	Box Plots show concern, K-40,B-214 FSS are from different populations. Box plot Ac-228. RAS appeared to show greater variability and activity than the other sets. The biased samples appear to represent a less diverse and lower activity population compared to the others. The biased samples should have been collected at the hot spots. Bi-214 shows similar. Same for K-40 . Ac-228, Bi-214	Q-Q plots - slope breaks show sometimes flatter, sometimes steeper, could mean different populations	8 with 10 rounds of sampling	3 samples have values that differ by more than 10x: Form states, "For sample 70-PDT-085-30 values differing by more than 10X: Am-241 (0.05 pCi/g vs -0.47951 pCi/g), Cs-137 (-0.031 vs 0.057843 pCi/g), Eu-154 (-0.04 vs - 0.00499 pCi/g), For sample 70 PDT 08: 31 values differing by more than 10X: Am-241 (0.002 vs 0.024914), Cs 137 (0.002 vs 0.076543). For sample 70-PDT 085-33 values differing by more than 10X: Eu-154 (0.004 vs 0.084744 pCi/g)."
TU087	2	Only one set of SYS samples collected. No bias samples. Unusually small variability for Bi-214 is suspicious.	Slope break on all 3 - indicates two populations.	1	None noted. Gamma and statics noted to be consistent, but no elevated spots found in gamma scan. Unclear if this means that highs could have been deleted. No bias samples collected.  Two samples vary by more than 10x: Form states, "For sample 70-PDT-087-10 values differing by more than 10X: TI-208 (0.022043 vs 0.344), U-235 (-0.99377 vs 0.08). For sample 70-PDT-087-11 values differing by more than 10X: Am-241 (0.03806 vs 0.001), Cs-137 (0.049789 vs -0.0006), Eu-154 (0.11423 vs 0), and Pa 234m (0.16956 vs -0.007)."
TU088	2	SYS-1 has more variability than any of the other data sets. FSS-Bias slightly less variable than FSS-SYS. FSS-SYS has less variability and a lower mean than the other data sets.	Slope break on all 3 - indicates two populations.	4	None noted. Gamma and statics noted to be consistent.
TU089	0	Only one set of SYS samples collected. No bias samples because no gamma scan exceedences.	Slope break on all 3 - indicates two populations.	1	None noted. Gamma and statics noted to be consistent.
TU091	2	K-40 and Ac-228 FSS_Bias appear to be different	Appear to be slope breaks on Ac-228 and Bi-214 plots	3	None noted. Gamma and statics noted to be consistent.
TU092	2	Bi-214 appears to have unusually low variability.			None noted. Gamma and statics noted to be consistent.

No anomalies in trends observed; howevere Ac-228 results were low, with some reported as 0 or negative (RAS).  Large range of values are reported for all survey types for K-40, which appears to indicate more than one	1	J Cunningham  M Snyder	1	1 - RAS Samples 56 and 58 were collected 05/05/08, sample 57 listed as collected on 05/08/08; reports however, were generated on 05/05/08. Record of collection date for sample 57 may be typographical, or may indicate falsification.  2 -Static data (5,611 - 6,564 cpm) were inconsistent with Scan data (4,750 - 6,920 cpm).  The FSS results demonstrate high variability in K-40 results but low variability in Ac-228 and Bi-214.  Pb-214 (daughter of Ra-226) noted to have two populations  Data Eval Form states Static and Scan data (2,000 - 5,000 cpm) are inconsistent. Static data range not provided.	com of re poor pote the s de P  Scar FS:	n data collected after	1 - RAS Samples 56 and 58 were collected 05/05/08, sample 57 listed as collected on 05/08/08; reports however, were generated on 05/05/08. Record of collection date for sample 57 may be typographical, or may indicate falsification.  2 - Static data (5,611 - 6,564 cpm) were inconsistent with Scan data (4,750 - 6,920 cpm).  3 - Suspect worker involved with data collection.  4 - TU082 is adjacent to TUs 077, 080, 081 which all included several Ac-228 results at or below 0. Data Eval Form incidates Bi-212 and Pb-212 in the Th-232 decay series were consistent with other sample results in TU082. This may indicate a data quality issue with the analysis and reporting of Ac-228.  Recommend for re-sampling  1 - Sanitary sewer is associated with Bldg 401. Data Eval Form states that Bldg 401 was not identified in the HRA but that after it was leased, sealed radiological sourcs (dials and gauges) were stored in the building. Data Eval Form also states no contamination was identified on surfaces or drains, therefore there is no reasonable potenetial that Bldg 401 activities contaminaed the sewer system. Note: Based on revelations about building scan falsification issues, the reviewer questions how thorough or accurate surveys done on surfaces or drains in this building were.  1 Is Bldg. 401 going to receive additional investigation?  2 - Adjacent TUs include 076, 123, and 124.	EPA statistician prepared additional specific analysis for this survey unit, shown separtely
population of soil type may be represented in the data.				Data Eval Form states Static data are potentially falsified but no evidence regarding sampling falsification is available.  Static scan date and time not provided in SUPR	Scar aft	nning was performed fter the FSS samples were collected.	3 - Static and scan data are inconsistent; static results were not provided but scan data ranged from 2,000 - 5,000 cpm. Even number cpm values is suspect.  4 - Scan data collected after FSS. This is suspect for falsification of Scan and Static measurement data.  Static data range need to be added to this D Eval Form for TU08	ata
				Scanning was performed after FSS samples collected.			Recommend re-sample.	
Form notes, "Some Characterization samples display different characteristics from other bias, characterization, and final systematic samples."	0	P DeLong	1	Mean and variability of bias samples less than FSS_SYS and characterization samples. Appear to represent a different population. Multiple rounds of excavation. On- and off-site samples differ by more than 10x.	0		Recommend resampling to confirm ROC concentrations for several reasons - inconsistent off-site lab results, mean and variability of bias samples inconsistent with FSS_SYS samples that appear to be a different population, evidence for multiple populations on Q-Q plots, 8 rounds of excavation.	
1 Ac-228 result below 0	1	R Roberson	1	10x difference between on- and off-site lab in 2 samples. Unusually small variability in Bi-214 data set.	1 coll	No bias samples lected. Gamma scan conducted after FSS nples were collected.	This could be a data set where the scans were manipulated to remove highs, and then the FSS samples were biased to areas with low gamma scan result, but the form indicates that the gamma scan was performed after the FSS samples were collected. 7 manholes removed from this TU. Elevated gamma survey results were identified for Manholes MH340 and MH342, which were disposed as LLRW. Falsification identified in adjacent TU0086. Concern only moderate - could be real data.	
1 Ac-228 result below 0	1	A Jahr	0		0		Lower variability in FSS-SYS and FSS-Bias may indicate successful remediation or could indicate potential falsification (narrow range unusual). Low-to moderate concern. May be candidate for Tier 2 resampling. K-40: 1 event (3/4/08 RAS) has less variability than other 8 events.	
2 Ac-228 results below 0	0	P Vigil	0		1	No bias samples collected.	1 event. Otherwise no concerns	
	1	J Cunningham	0		0	33300041	Box plots and Q-Q plots indicate different populations. Less variability in Bi-214 samples may mean success in remediating this SU, but could also mean falsification. Resample due to uncertainty.	EPA statistician prepared additional specific analysis for this survey unit, shown separtely
2 Ac-228 results below 0	0	M Snyder	0		0		Due to identification of Cs-137 in a pipe removed from this TU, 37 biased samples were collected from the bottom of the trench. No exceedances. Low to moderate concern due to unusually low variability for Bi-214. However, this site was a Cs-137 site. Resample due to uncertainty.	

TU093 2	Ac-228 and Bi-214 FSS_SYS and FSS_Bias have less variability than the SYS_1 samples Negative Cesium values beginning in 5/30/2008  Bi-214 has unusually small ranges FSS samples compared to characterization samples.	e for 3	Form states, "Gamma scan dataset consistent with FSS sample dataset but inconsister with static data. No date or time recorded for static survey in SUPR. Static measurements were inconsistent with scan data (slightly larger than the scan range) but still less than the 3 sigma scan level."	Form states, "The on-site and off-site laboratories reported Ra-226 activity above the MDA/MDL for both samples. As a result, the Ra-226 activities for two samples were compared directly for precision. The results of the comparison showed relative percent differences (RPDs) from 95.12 to [and] 117.38. Because the on-site laboratory reported higher Ra-226 activity than the off-site laboratory and the RPDs were not within 30, as stated in the Sampling and Analysis Plan." None of the FSS samples were sent to the off-site lab, which should have been done.
TU096 2	Only one data set - FSS_SYS. Bi-214 samples have low variability and all results within a low range. No bias samples collected.  Appear to be slope breaks on A and K-40 plots, probably 2 populations.	i	Form states, "Static survey date and time not provided in SUPR Gamma static dataset inconsistent (small variance) with FSS sample dataset and gamma scan dataset. Gamma static measurements do not appear to represent conditions at TU096".	consistent
TU097 2	Bias sample plots for Ac-228, B and K-40 have slope breaks, ind multiple populations. Form in "Samples 9 to 79 show low concentrations of Bi-214 and Ac Samples 9 to 40 were collected 08/19/2008. Samples 41 to 79 collected on 08/20/2008. Th samples were counted on 08/21 compared to characterization and FSS_1. However, K-40 shows the opposite (more variability). FSS_SYS samples appear to be a different population.  Bias sample plots for Ac-228, B and K-40 have slope breaks, ind multiple populations. Form in "Samples 9 to 79 show low concentrations of Bi-214 and Ac Samples 9 to 40 were collected 08/19/2008. Samples were counted on 08/21 08/22/2008, and 08/25/2008. samples were not biased to a splocation, but were distributed the bottom of the trench to investigate potential leaks from pipes. These samples do not apple representative of condition TU097. The small volumes of removed to remediate areas elevated activity would not reschanges to the entire distribution notes one inconsistent reference 096.	cating otes, -228. I on were se (2008, these ecific long of the sear to sat soil of alt in n." KB	Form notes: "Static survey date and time not provided in SUPR.  Gamma static dataset inconsistent (low variability) with FSS and gamma scan dataset Gamma static measurements do not appear to represent conditions at TU096. Gamm scan results consistent with FSS dataset and inconsistent with gamma static dataset. and "No measurements above the investigation level were identified during the performance of gamma scans in Trench Unit 97. Seventy-nine investigative samples were collected along the trench bottom at 3-foot intervals because pipe sediment samples identified cesium-137 (Cs-137) activity at 0.17977 to 0.26670 pico Curie per gram (pCi/g) and radium-226 (Ra-226) activity at 1.8063 to 3.4019 pCi/g. Six of the investigative sample results identified Ra-226 activity to be present at 1.8799 to 2.4089 pCi/g."	7 samples noted to be consistent.
TU098 2	K-40 - mean for Final is highest and less variable. Seems odd that FSS would have a different mean from the others. Ac-228 and Bi-214 have similar means, but less variability. for FSS_SYS. No FSS Bias samples collected.  Negative CS-137 values; Ac-228 and Bi-214 mean is higher and more variable for 1/13/09 event as compared to others appears to be a different population.  Slope break on all 3 - indicates populations.	two 6	Form states, "Reported gamma static counts are suspect; ranged within an unusually narrow band between 4,211 and 4,632 gcpm. No reviewer or review date reported. Gamma static counts are not consistent with the reported gamma scan range and FS dataset. " Also, "Scan range reported as 2,900 to 9,400 gcpm, apparently exceeding the investigation level of 7,048 gcpm without further explanation. This gamma scan range is not consistent with the gamma static counts, but could be consistent with the FSS dataset. "	
TU099 2	Cs-137 samples show unusually low variability. K-40 plots have slope breaks, a characterization samples for Ar and Bi-214, suggests multip populations	-228	Form notes: "Static survey date and time not provided in SUPR. Static results reported low variability, inconsistent with gamma scan results and Final Systematic dataset."	d Form notes only 2 samples, inconclusive

1 Ac-228 result below 0	0	J Gutierrez	0	1 No date for Sta	One pipe segment had Cs-137 above release criteria, so 23 biased samples were collected along the trench bottom.  No contamination found. However, due to the low variability of the Bi-214 data, the lack of an off-site lab sample for the FSS data set, and the scan/static inconsistencies (including no dates for the static survey), this SU should be resampled.
2 Ac-228 results below 0	1	J Cunningham	1	Statics inconsistent with FSS and gamma scan data set. Low variability in Bi-214 results. No  Biased samples.  No bias samp collected. No da statics.	I Recample (no date for statics statics inconsistent with 111 96; no biased camples; low variability in Ri-714 results ).
Form notes, "Initial Bias and other bias results display different characteristics from other Bias, Characterization and FSS samples." and for K-40, " Notes: FSS sample 129 had a high result different from other samples." For Ac-228, there were several biased sample results at or below 0.	1	J Cunningham	1	Form notes, "Based on the findings of this evaluation, evidence of potential data falsification was found. It is unlikely the Biased Samples 9 to 79 represent actual conditions within TU097." KB  notes that the inconsistent static survey data also indicates probable falsification.	Resample. (no date for statics, statics inconsistent with TU 97; no biased samples; low variability in Bi-214 results; falsification noted by Navy.) . K-40 FSS different population. Ac-228 and Bi-214 appear to be different populations at different times.
Form states about first samples, " The Visual Sample Plan (VSP) was used to generate 18 systematic sample locations (samples 1 to 18) based on a random start point and a triangular grid. Four of the sample results identified radium-226 (Ra-226) activity to be present at 1.7536 to 2.7581 picocuries per gram (pCi/g). Based on this information, 29 additional samples were collected to further characterize the trench. Characterization sampling identified five additional locations where Ra-226 activity was identified to be present above the release criteria, at 1.5349 to 3.7863 pCi/g."	0	C Hughes	1	Statics inconsistent with FSS and gamma scan data set. Low variability in Bi-214 results. No Biased samples.  1 No sampler na	Recommend resample to confirm ROC concentrations (statics inconsistent with gamma scan data set, low variability in Bi-214 results, no biased samples)
Forms note for Bi-214 and Ac-228: "Third set of characterization data shows a different distribution from other data."	1	D DeLong	1	Inconsistent statics, no final bias samples, third set of characterization data has different distribution.  22 sampling events - Results for Ac-228, B-212, and Bi-214 have different variability for the Sys_1 time, no 2/2/09 sampling event. Similar to S0119. Cs-137 different for the 11/13/08, 5/13/09, 6/12/09 and 6/18/09 events.	te and Some samples not analyzed within 2 weeks. Cs-137 remediation, Highest Cs-137 concentration recorded in Parcel G, but unusually low Cs-137 variability. Too many rounds of excavation. Inconsistent statics, different data distributions. Resample to confirm ROC concentrations

TU100	2	Only one data set - FSS_SYS. Bi-214 samples have low variability and all results within a low range. No bias samples collected.	All 3 plots have slope breaks, suggest more than one population in FSS_SYS.	Form notes: "No signature and date from site RSO was recorded on this survey. No gamma scan data was available for review to compare with the FSS samples specific dataset static/scan results." Also no signature for static survey.	Form says consistent.
TU101	2	Ac-228 and K-40 FSS_SYS have greater variability than SYS_1 or characterizations sets. Bi-214 characterization samples appear to be different population (lower variability, smaller data range). No FSS_Bias samples. Form notes: "Sample distribution of Final Systematic samples is slightly more variable compared with other sample types of Bias and Characterization. One outlier was identified for Bi-214 and Ac-228."	Ac-228, Bi-214, K-40 FSS_SYS have slope break, indicating 2 populations. Unusually low range of results, variability for Cs-137 samples.	Form notes: "The scan survey was performed on 07/19/2008 Scan range for 2350-1 Instrument is 2,970 – 6,590 cpm, exceeding the 3-sigma investigation level for 2350-1 instrument (6,161 cpm). No signature and date from site RSO was recorded on this survey. No gamma scan data was available for review to compare with the Final Systematic samples specific dataset static/scan results." For statics, "The highest count was recorded at 5,842 cpm for sample location 029." Unclear, but bias samples should probably have been collected.	1
TU102	2	Ac-228, Bi-214, K-40 FSS_SYS have greater variability than other two data sets, while characterization samples have less varability. Cs-137 characterization data has the most variability. No FSS_Bias. Form notes: "Final Systematic sample distribution more variables compared to Bias and Characterization samples for Ac-228, Bi-214, and K-40."	Ac-228, Bi-214, K-40 FSS_SYS have slope breaks, indicating 2 populations. Unusually low range of results, variability for Cs-137 samples. Form 2 notes: "The graph is more vertical than expected for the Final Systematic Ac-228 samples."	Form notes: "The scan survey was performed on 07/11/2008 Scan range for 2350-1 Instrument is 2,310 – 5,960 cpm. The 3 sigma investigation level for 2350-1 Instrument was 6,161 cpm. No signature and date from the site RSO was recorded on this survey. No gamma scan data was available for review to compare with the Final Systematic samples specific dataset static/scan results." FORM for TU101 notes about TU102: "The static data results for TU 102 is inconsistent compared with the adjacent trenches. The lowest static count was reported for TU102 at 2,471 cpm compared to 3,300 cpm for TU100 and 4,366 cpm for TU070. The highest static count was reported at 6,531 cpm for TU100 compared to 5,377 cpm for TU102."	Form notes: "Data comparison is relatively close for Ac-228, Bi-214, and K-40."Data inconsistent with Final Systematic sample (046) for the K-40 results. Onsite result was 20.29 pCi/g while the offsite result was 8.2 pCi/g."
TU103	2		3	FSS Scan data elevelated compared to sample data/several samples may have been substituted, Gamma Scan Survey performed on 05/28/2009 at 13:40 on the same day as Final  Systematic Sample collection.  Gamma scan dataset inconsistent with static data. Scan Data range 2,910 – 8,510 cpm, exceeding the investigation level of 7,048 cpm. Static data range 3,100 – 3,400 cpm.	
TU104	2		abnormally narrow range of measurement values.	Gamma Scan Survey performed on 05/28/2009 at 13:40 on the same day as Final Systematic Sample collection.  Scan survey performed on 09/30/2008 at 07:40 prior to FSS sample collection.  Gamma static dataset inconsistent with scan data and FSS sample dataset. Static range from 3,900 – 4,300 cpm with a STDEV of 136 cpm. Scan data has a range of 1,170 – 8,170 cpm exceeding the investigation level of 4,078 cpm.	
TU106	2			Static survey date and time not provided in SUPR. Gamma static dataset inconsistent (standard deviation of the static measurements is too small at 97 cpm) with scan data and Final Systematic sample dataset. Scan survey performed on 04/22/2009 at 08:00 prior to Final Systematic sample collection. Scan range exceeds the 3 sigma scan threshold. Scan data inconsistent with FSS sample dataset and static data.	
TU107	2			Scan survey performed on 10/14/2008 at 08:15 prior to Final Systematic sample collection. Gamma scan contained measurements greater than the 3-sigma threshold. No date or time recorded for static survey in SUPR. Gamma static dataset consistent with scan data and Final Systematic sample dataset	

1	R Zahensky	1	No final bias samples, low variability in B-214 data set. No gamma scan data in SUPR.	No signature and date from site RSO for gamma scan and statics. No gamma scan data available in SUPR.	No biased samples. Missing signature and lack of gamma scan data is troubling. Low variability in B-214 data. Only 1 sampling event FSS-SYS. Need to resample.	
Form notes: "The data range for K-40 from 4.68 through 14.96 pCi/g."	R Zahensky	1	No gamma scan data available. Should have been in SUPR.	No Site RSO signature, no FSS_Bias. Gamma scan data suggest statics should have been collected.	Should resample due to uncertainty - lack of gamma scan data, no FSS_Bias samples, different populations in data sets.	
Form notes: "The data range for K-40 from 5.06 through 20.22 pCi/g."	R Zahensky	1	Unusually low variability for Cs-137. Missing bias samples. Possibly inconsistent statics. Missing gamma scans.	No signature and date from site RSO for gamma scan and statics. No gamma scan data available in SUPR.	See TU101 form, whi notes "The static dat results for TU 102 is inconsistent compare with the adjacent trenches. The lowes static count was reported for TU102 and 4,366 cpm for TU070. The highest static count was reported at 6,531 cp for TU100 compared 5,377 cpm for TU102 Is this relevant for TU101 or 102?	a sed t to 0 0 m to . "
0	C Hughes	1	Sampler Namer Not provided in SUPR. 2) Biased samples have low activity concentration when compared with the FSS samples even though gamma scan meausements were higher; therefore, samples may have been collected somewhere else	1	Biased Samples may have been collected somewhere else within the trench or elsewhere, Resample to confirm ROC concentrations,	
0	C Hughes	1	Sampler Namer Not provided in SUPR. 2) No Bias Samples collected when warranted by Scan measurements, samples may have been collected somewhere else within the trench	yes, No BIAS Samples 1 collected based on scan data	No Bias samples collected when warranted based on Scan Survey. Resample to confirm ROC concentrations.  1 event	
0	C Hughes	1	1) Static survey date and time not provided in SUPR. Gamma static dataset inconsistent (standard deviation of the static measurements is too small at 97 cpm) with scan data and Final Systematic sample dataset 2) Scan survey performed on 04/22/2009 at 08:00 prior to Final Systematic sample collection. Scan range exceeds the 3 sigma scan threshold. Scan data inconsistent with FSS sample dataset and static data.	0	Samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations	
0	C Hughes	0	Scan range exceeds the 3 sigma scan threshold. Scan data inconsistent with FSS sample dataset and static data.	0	Samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations	

TABLE  2 International Conference of the Second Conference of the Secon				,	
Third 2 is a server to the contract of the con	TU108 2	2			Systematic sampling. Scan range is 2,390 – 7,900 cpm, exceeding the 3 sigma
1033  2 *** A 28 of 4 of 128 of the result of the control of the c	TU111 0	0			Scan and static survey date and time were not recorded
Hill Statemeric and light of the part of the control of the contro	TU115 2	2	way falsification caught in 2012 was K- 40 for FSSR not the same as original. Slope for Ac-228 looks like 2 different populations in biased samples.FSS samples display characteristics of two data populations for Bi-214, Ac-228, and K-		
General scanned activity control and only and control and personal control activity control activity. See activity control activity control activity control activity control activity. See activity control activity control activity control activity. See activity control activity control activity control activity control activity. See activity control activity control activity. See activity control activity control activity control activity. See activity. See activity control activity. See activit	TU116 2	2			Final Systematic sampling. Some scan measurements exceeded the scan
10.118  10  10  10  10  10  10  10  10  10	TU117 2	2			
Gamma static counts ranged within a narrow band between 3,844 goars and 4,747 gpp and an end consistent with the gamma state range or 155 diseaset, Performed by a suppert working, to reviewed the form can go and an end consistent with the gamma state range or 155 diseaset, Performed by a suppert working, to reviewed working for an end of 1,014 gpp or without in their engangement of 1,000 gpp or without in their engangement of 1,000 gpp or without in their engangements are ranged gamma states and a supper working or the range of gamma states diseaset in excessionates with scan data and final dystamatic so rapid diseaset.  10 Static survey date and their rost provided in SUPIs.  Comma static diseaset in excessionates with scan data and final dystamatic so rapid diseaset.  10 In static gamma measurements, was the collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling, do not reflect the week it is rost were collected before sampling and not reflect the week it is rost were collected before sampling and not reflect the way and formed part of the sample part and the rest support particles. It is shown that the rest support particles in the sample of the sample representation from 7,000 gpm; Sample weekly the grant developed game game and sample collected.  2	TU118 0	0			Static results reported low variability inconsistent with gamma scan results and lab data. 2) Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection.
TU121  2  4,747 gaps made are not consistent with the gamma can range or PSS dataset. Performed by a support content provided nor review data reported and of C124/2000 at 00 (fill by a support content, or review data reported and 3,300 – 7,700 gaps may be content by the object of content with the range of gamma state can state as a support of content with the range of gamma state can state decrease above, but it consistent with the range of gamma state can state decrease above, but it consistent with the range of gamma state can state decrease income sized with corn data and final Systematic sample.  The state gamma content with one data and final Systematic sample.  The state gamma content with one of content of the state of reflect the valuability downed in later the range of the scan range and sample cellular gamma can amplify the order of reflect the valuability downed in later the range of the scan range and sample cellular gamma can s	TU119 2	2		7	
Gamma static dataset inconsistent with scan data and Final Systematic sample dataset (at the data and Final Systematic sample dataset (at the data and Final Systematic sample dataset).  The static gamma measurements, which were collected before sampling, do not reflect the variability observed in either the range of the scan results or the analytical results. The analytical results are are range and sample paper plausible. It should be noted that scan results about the investigation level were apparently never investigate the investigation level were apparently never investigate the investigation level were apparently never investigation level and static range a 3,748 – 4,220 cpm  Scan range = 3,748 – 4,220 cpm  Scan range = 3,748 – 4,220 cpm  Scan range = 3,900 – 8,240 cpm  (investigation level = 7,048 cpm) Scan range = 1,390 – 8,240 cpm  (investigation level = 7,048 cpm) Scan range = 1,390 – 8,240 cpm  Gamma scan dataset Inconsistent with static data and/or Final Systematic sample collection.  Gamma scan dataset Inconsistent with static data and/or Final Systematic sample dataset.	TU121 2	2			4,747 gcpm and are not consistent with the gamma scan range or FSS dataset.  Performed by a suspect worker; no reviewer or review data reported. Performed on  01/24/2009 at 09:40h by a suspect worker. Scan range listed as  3,300 – 7,700 gcpm, apparently exceeding the IL of 7,048 gcpm without further  explanation. This gamma scan range is not consistent with the range of gamma
TU151 0 Box Plots show concern 1 Performed by a suspect worker; no reviewer or review data reported.	TU124 2	2		3	Gamma static dataset inconsistent with scan data and Final Systematic sample dataset  The static gamma measurements, which were collected before sampling, do not reflect the variability observed in either the range of the scan results or the analytical results. The scan range and sample activity range appear plausible. It should be noted that scan results above the investigation level were apparently never investigated or sampled.  Static range = 3,748 – 4,220 cpm  Scan range = 1,390 – 8,240 cpm (investigation level = 7,048 cpm)  Sample activity range (K-40) = 3.5 – 13.5 pCi/g Scan range = 1,390 – 8,240 cpm  (investigation level = 7,048 cpm) Scan survey performed on 07/06/2012 at 10:00 prior to Final Systematic sample collection.  Gamma scan dataset inconsistent with static data and/or Final Systematic sample
	TU151 0	0	Box Plots show concern	1	Performed by a suspect worker; no reviewer or review data reported.

	<u>r</u>								
	0		Hughes		Scan survey performed on 05/06/2009 at 13:50 after the commencement of Final Systematic sampling. Scan range is 2,390 – 7,900 cpm, exceeding the 3 sigma investigation level of 7,048 cpm. Bias Samples have lower overall activity when compared with FSS samples.	the	yes, No BIAS Samples Samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations. Cs- 137 varies significantly during the 5/30/08 event due to negative activity levels for this event. Why negative measurements? Operator?  e scan and static survey	Cs-137 varies significantly during the 5/30/08 event due to negative activity levels for this event. Why negative measurements? Operator?	
	1	J Cunningham		0		da	ate and time were not work performed by suspect worker, only 1 sampling event recorded		
	1	B Evans		1	K-40 Final sample set appears different from earlier. Ac-228 shows 2 different populations, scan measurements higher earlier inconsistent with final sample results		Close to impacted area, had a lot of remediation, Difficult to excavate more. Suspect worker Identified		
	0	сн	lughes	1	Scan survey performed on 04/27/2009 at 08:45 prior to the commencement of Final Systematic sampling. Some scan measurements exceeded the scan threshold.  K-40, Ac-228, Bi-214 population on 4/15/09 appears different from the other 5 events		Biased samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations		
	1	J Cunningham		1	Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection.  Gamma scan dataset not consistent with static dataset.		Suspect Worker samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations. Only 1 sampling event - FSS-SYS		
	0	СН	Hughes	0	1) Static survey date and time not provided in SUPR.  Static results reported low variability inconsistent with gamma scan results and lab data. 2) Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection.  Gamma scan dataset not consistent with static dataset.		Only 1 sampling event - FSS-SYS		
	1	J Cunningham		0	Bi-214 have different variability for the Sys_1 2/2/09 sampling event. 1		Suspect Worker samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations		
	1	J Cunningham		1	Some of the samples collected appear to be from a different population 1	1	yes, No BIAS Samples ollected based on scan Suspect Worker, samples may have been collected somewhere else, Resample to confirm ROC concentrations data for FSS		EPA statistician prepared additional specific analysis for this survey unit, shown separtely
FSS samples appear to be from a different population	1	D DeLong		1	1)Gamma scan dataset inconsistent with static data and/or Final Systematic sample dataset. Samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations		Suspect Worker, FSS Samples appear to be from a different population of samples. Samples may have been collected somewhere else , Resample to confirm ROC concentrations 6 RAS events followed by 2 FSS events. Variability for Ac-228 and Bi-214 for the final 2 FSS events (6/22/09 and 7/6/09) is smaller than the RAS events (1/29/09 thru 6/11/09) and activity levels drop below clean-up levels over the 11 day period between RAS and FSS.		
	1	J Cunningham		0	0		Suspect Worker, samples may have been collected somewhere else, only 1 sampling event? Resample to confirm ROC concentrations		
	1	<u> </u>	L		I		Concentrations		<u> </u>

TU204 2	Box Plots indicate Narrow Range, but scan data indicates a larger range	The scan survey was performed on 06/15/2011. Scan range for 2350-1 Instrument is 4,000 to 7,610 cpm. The 3 sigma investigation level for 2350-1 Instrument was 8,014 cpm. No signature and date from the site RSO was recorded on this survey.  No raw scan data was provided in the SUPR.
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1 J Cunningham samples may have been collected somewhere else within the trench, Resample to confirm RO concentrations	yes, No BIAS Samples collected based on scan data for FSS	Suspect Worker, samples may have been collected somewhere else, Resample to confirm ROC concentrations	
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## Summary of EPA review of Parcel G Trench

Number of TU's	% of Parcel G total			
63	100%			
Navy reviewed 63 tota	l Trench Units to look			
20	32%			
0	0%			
43	68%			
EPA reviewed the 43 Trench Units recommm				
4	6%			
0	0%			
39	62%			
Total Navy and EPA recommend for resamp				
59	94%			

Trench Unit	EPA score
TU089	0
TU111	0
TU118	0
TU151	0
TU067	2
TU068	2
TU069	2
TU071	2
TU072	2
TU073	2
TU074	2
TU075	2
TU076	2
TU078	2
TU079	2
TU080	2
TU082	2
TU083	2
TU085	2
TU087	2
TU088	2
TU091	2
TU092	2
TU093	2
TU096	2
TU097	2
TU098	2

## Units Draft 10-20-2017

Total trench units in Parcel G

for signs of potential falsification

Navy recommended confirmation sampling due to signs of potential falsification

Navy recommended reanalysis of archived samples

Navy recommended NFA = No further action due to signs of falsification, but potential further action due to uncertainty

ended for NFA

EPA score 0 = No specific findings of particular concern

EPA Score 1 = Need further review

EPA Score 2 = Need resampling before determination that the record supports ROD requirements met

ing

Note: TU 66 and TU 70 the Navy recommended for partial re-sampling only. However, both are marked for full resampling due to suspect soil from the fill unit that was used to fill those TUs.

## Draft Interim EPA and DTSC review of Parcel G Rad Data Eval 10-20-2017

	Trench	Fill	Building Sites
Tota Survey Units in Parcel G	63	107	32
Navy recommended resampling	20	53	25
EPA, CDPH, DTSC recommend resampling	39	54	5
Total recommended resampling	59	107	30
% of total recommended resampling	94%	100%	94%

The above was for Parcel G alone. Below is for entire Shipyard.

Total Survey Units in Hunters Pt Tetra Tech EC	305	514	*
Parcel G as % of total	21%	21%	*

<sup>\*</sup> Parcel G has 4 former buildings, which is 12% of the total 34.

The above shows survey units at building sites.

he number of survey units at building sites for the entire site was not available

TU099	2
TU100	2
TU101	2
TU102	2
TU102	2
TU103	2
TU104	2
TU106	2
TU107	2
TU108	2
TU115	2
TU116	2
TU117	2
TU119	2
TU121	2
TU124	2
TU204	2



